



VIRGINIA
& AMBINDER LLP
A t t o r n e y s a t L a w

40 Broad Street, 7th Floor
New York, NY 10004
Telephone: (212) 943-9080

April 21, 2021

John M. Harras
Partner
jharras@vandallp.com

VIA ELECTRONIC CASE FILING

Honorable Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: ***Trs. of the Ne. Carpenters Health, Pension, Annuity, Apprenticeship Funds, et al. v. Knight Wood Flooring, Inc., et al.; Civil Action No.: 20 CV 10055 (PGG)***

Dear Judge Gardephe:

This firm represents Plaintiffs in the above-referenced action. Plaintiffs, writing jointly with Defendants, submit this letter as a motion to change venue from the Southern District of New York to the Northern District of New York on consent of all parties in this action.

On April 8, 2021, the Court directed Defendants to inform the Court whether they intended to move to change venue. Since then, the parties have conferred on the most appropriate venue for this action. Based on that conferral, Plaintiffs have consented to Defendants' request to move the venue of this case from the Southern District of New York to the Northern District, as Defendants and relevant witnesses reside in the Northern District of New York.

Therefore, the parties jointly move this Court, pursuant to 28 U.S.C. § 1404(a), for an order transferring the venue of this civil action from the Southern District of New York to the Northern District of New York. All parties consent to this transfer of venue.

The parties thank the Court for its time and attention to this matter.

Memo Endorsed: With the consent of the parties, this matter is transferred to the U.S. District Court for the Northern District of New York.

Respectfully submitted,

/s/
John M. Harras, Esq.

SO ORDERED.

A handwritten signature in black ink that reads "Paul G. Gardephe".

/s/
Paul M. Freeman, Esq.

Paul G. Gardephe
United States District Judge

Dated: April 22, 2021